

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	:	
MICHELLE HEIM &	:	
GEORGE STEFNIC	:	Bankruptcy No. 5:16-bk-05102
Debtor's	:	
	:	Chapter 7

**MOTION TO AVOID JUDICIAL LIEN
OF MANUFACTURERS AND TRADE**

TO THE HONORABLE ROBERT N. OPAL, II, THE JUDGE OF SAID COURT:

As a claim for Relief, the Debtors allege as follows:

1. This case was commenced by the filing of a Voluntary Petition for Relief under Chapter 7 of Title 11 of the United States Bankruptcy Code on December 15, 2016.
2. On July 22, 2002, Manufacturers and Trade ("Creditor"), entered Judgment against the Debtor's in the Schuylkill County Court of Common Pleas, Docket No. S-543-2002.
3. Debtors are entitled to the exemptions claimed on Schedule C filed in this case.
4. The exemptions of the Debtors is impaired by the lien set forth above.
5. Debtors allege that the lien of the Creditor is avoidable, in its entirety, pursuant to 11 U.S.C. Section 522(f).

WHEREFORE, Debtors pray that the Court enter an Order avoiding the lien of the Creditor in its entirety.

_____, 2017
Date

Respectfully submitted,
/s/
Robert M. Reedy, Esquire
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**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtors name(s) used by the Debtor(s) in the last eight (8) years, including married, maiden, and trade names:

**Michelle Heim &
George Stefnic,**

Debtors

Chapter 7

Case number: 5:16-bk-05102

vs.

**Michelle Heim &
George Stefnic,**

Movants

Matter: Motion to Avoid Judicial Lien

vs.

MANUFACTURERS and TRADE,
Respondent

NOTICE

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this Motion, objection or other matter without further notice or hearing unless a party in interest files an objection/response within twenty-one (21) days of the date of this Notice. If you object to the relief requested, you must file your objections/response with the Clerk, U.S. Bankruptcy Court, 228 Walnut Street, Third Floor, P.O. Box 908, Harrisburg, PA 17108-0908, and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objections/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the Court will deem the motion unopposed and proceed to consider the Motion without further notice or hearing, and may grant the relief requested.

Date: February 15, 2017

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